

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	*	CHAPTER 13
JOSEPH A. MARKO and	*	BANKRUPTCY NO. 19-15200
CARRIE MARKO	*	
Debtors	*	

MORION OF CARRIE MARKO
FOR RELIEF FROM AUTOMATIC STAY UNDER §362 OF THE BANKRUPTCY CODE

Movant, Carrie Marko, by and through her attorney, Kenneth G. Harrison, Esquire, respectfully represents as follows:

1. Movant is Carrie Marko, the Wife of Joseph A. Marko, and a debtor in this action.
2. Debtor is Joseph A. Marko, the Husband of Carrie Marko, and a debtor in this action.
3. On August 20, 2019, Husband and Wife filed the above Chapter 13 bankruptcy.
4. On November 21, 2019, Wife filed a Complaint in Divorce in the Court of Common Pleas of Bucks County with a Docket No. 2015-62227.
5. The parties own the real estate located at 444 Beechwood Avenue, Feasterville, PA 19053.
6. Husband is currently residing at this residence and is responsible for the mortgage and all other expenses for the property.
7. There is equity in the property which Wife desires to protect in the divorce case.
8. Wife is desirous of moving forward with the divorce,

including equitable distribution, and cannot proceed because Husband has been recalcitrant in cooperating with the divorce proceedings, and now, clearly to delay the divorce matter, has filed a Suggestion of Bankruptcy with the Family Court prothonotary.

9. Movant requests permission from this Honorable Court to allow her or her attorney to communicate with Joseph A, Marko or his divorce attorney concerning the divorce matter.

WHEREFORE, Movant, Carrie Marko, respectfully requests that this Honorable Court to enter an Order:

a. modifying the Automatic Stay under Section 362 to allow for all divorce proceedings between Joseph A. Marko and Carrie Marko, including, but not limited to equitable distribution, to proceed in the Court of Common Pleas of Bucks County.

Respectfully submitted,

s/s Kenneth G. Harrison
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